

**ND ASSOCIATION OF COUNTIES FUND  
INVESTMENT PERFORMANCE REPORT AS OF OCTOBER 31, 2004**

	October-04				September-04				Current FYTD	Prior Year FY04	3 Years Ended 6/30/2004	5 Years Ended 6/30/2004
	Market Value	Allocation Actual	Policy	Month Net ROR	Market Value	Allocation Actual	Policy	Quarter Net ROR	Net	Net	Net	Net
<b>LARGE CAP DOMESTIC EQUITY</b>												
<i>Structured Growth</i>												
Los Angeles Capital	8,898	2.9%	3.0%	-0.28%	8,922	2.9%	3.0%	-4.14%	-4.41%	N/A	N/A	N/A
<b>Total Structured Growth</b>	<b>8,898</b>	<b>2.9%</b>	<b>3.0%</b>	<b>-0.28%</b>	<b>8,922</b>	<b>2.9%</b>	<b>3.0%</b>	<b>-4.14%</b>	<b>-4.41%</b>	<b>17.58%</b>	<b>-6.28%</b>	<b>N/A</b>
<i>Russell 1000 Growth</i>				1.56%				-5.23%	-3.75%	17.88%	-3.74%	N/A
<i>Structured Value</i>												
<b>LSV</b>	<b>9,712</b>	<b>3.1%</b>	<b>3.0%</b>	<b>-0.21%</b>	<b>9,730</b>	<b>3.2%</b>	<b>3.0%</b>	<b>3.21%</b>	<b>3.00%</b>	<b>30.56%</b>	<b>9.33%</b>	<b>N/A</b>
<i>Russell 1000 Value</i>				1.66%				1.54%	3.23%	21.13%	2.96%	N/A
<i>Russell 1000 Enhanced Index</i>												
<b>LA Capital</b>	<b>19,096</b>	<b>6.1%</b>	<b>6.0%</b>	<b>0.45%</b>	<b>19,007</b>	<b>6.2%</b>	<b>6.0%</b>	<b>-1.68%</b>	<b>-1.24%</b>	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>
<i>Russell 1000</i>				1.61%				-1.81%	-0.23%	N/A	N/A	N/A
<i>S&amp;P 500 Enhanced Index</i>												
<b>Westridge</b>	<b>18,758</b>	<b>6.0%</b>	<b>12.0%</b>	<b>1.55%</b>	<b>18,468</b>	<b>6.0%</b>	<b>12.0%</b>	<b>-1.99%</b>	<b>-0.48%</b>	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>
<i>S&amp;P 500</i>				1.53%				-1.87%	-0.37%	N/A	N/A	N/A
<i>Index</i>												
State Street	5,644			1.53%	5,559			-1.88%	-0.39%	19.01%	-0.75%	N/A
<b>Total Index</b>	<b>5,644</b>	<b>1.8%</b>	<b>2.0%</b>	<b>1.53%</b>	<b>5,559</b>	<b>1.8%</b>	<b>2.0%</b>	<b>-1.88%</b>	<b>-0.39%</b>	<b>19.01%</b>	<b>-0.75%</b>	<b>N/A</b>
<i>S&amp;P 500</i>				1.53%				-1.87%	-0.37%	19.11%	-0.70%	N/A
<b>TOTAL LARGE CAP DOMESTIC EQUITY</b>	<b>62,109</b>	<b>20.0%</b>	<b>20.0%</b>	<b>0.67%</b>	<b>61,686</b>	<b>20.1%</b>	<b>20.0%</b>	<b>-1.42%</b>	<b>-0.77%</b>	<b>21.46%</b>	<b>0.15%</b>	<b>N/A</b>
<i>S&amp;P 500</i>				1.53%				-1.87%	-0.37%	19.11%	-0.70%	N/A
<b>SMALL CAP DOMESTIC EQUITY</b>												
<i>Manager-of-Managers</i>												
<b>SEI</b>	<b>32,681</b>	<b>10.5%</b>	<b>10.0%</b>	<b>2.26%</b>	<b>31,955</b>	<b>10.4%</b>	<b>10.0%</b>	<b>-3.60%</b>	<b>-1.42%</b>	<b>32.99%</b>	<b>5.51%</b>	<b>N/A</b>
<i>Russell 2000 + 200bp</i>				2.14%				-2.36%	-0.28%	35.99%	7.90%	N/A
<b>TOTAL SMALL CAP DOMESTIC EQUITY</b>	<b>32,681</b>	<b>10.5%</b>	<b>10.0%</b>	<b>2.26%</b>	<b>31,955</b>	<b>10.4%</b>	<b>10.0%</b>	<b>-3.60%</b>	<b>-1.42%</b>	<b>32.99%</b>	<b>5.54%</b>	<b>N/A</b>
<i>Russell 2000</i>				1.97%				-2.86%	-0.94%	33.36%	6.24%	N/A
<b>CONVERTIBLES</b>												
<b>TCW</b>	<b>31,244</b>	<b>10.0%</b>	<b>10.0%</b>	<b>1.36%</b>	<b>30,822</b>	<b>10.0%</b>	<b>10.0%</b>	<b>-4.35%</b>	<b>-3.05%</b>	<b>17.50%</b>	<b>1.03%</b>	<b>N/A</b>
<i>First Boston Convertible Index</i>				0.39%				-1.05%	-0.67%	14.16%	4.89%	N/A
<b>INTERNATIONAL EQUITY</b>												
<i>Large Cap - Active</i>												
<b>Capital Guardian</b>	<b>24,962</b>	<b>8.0%</b>	<b>8.0%</b>	<b>2.18%</b>	<b>24,445</b>	<b>7.9%</b>	<b>8.0%</b>	<b>-1.77%</b>	<b>0.38%</b>	<b>25.36%</b>	<b>-0.39%</b>	<b>N/A</b>
<i>MSCI EAFE - 50% Hedged</i>				2.12%				-0.72%	1.39%	26.98%	-1.27%	N/A
<i>Small Cap - Value</i>												
<b>Lazard</b>	<b>3,407</b>	<b>1.1%</b>	<b>1.0%</b>	<b>3.70%</b>	<b>3,284</b>	<b>1.1%</b>	<b>1.0%</b>	<b>0.29%</b>	<b>4.00%</b>	<b>43.30%</b>	<b>N/A</b>	<b>N/A</b>
<i>Citigroup Broad Market Index &lt; \$2BN</i>				3.40%				-0.82%	2.55%	47.95%	N/A	N/A
<i>Small Cap - Growth</i>												
<b>Vanguard</b>	<b>3,217</b>	<b>1.0%</b>	<b>1.0%</b>	<b>3.03%</b>	<b>3,120</b>	<b>1.0%</b>	<b>1.0%</b>	<b>0.49%</b>	<b>3.54%</b>	<b>44.68%</b>	<b>N/A</b>	<b>N/A</b>
<i>SSB BROAD MARKET INDEX &lt; \$2BN</i>				3.40%				-0.82%	2.55%	47.95%	N/A	N/A
<b>TOTAL INTERNATIONAL EQUITY</b>	<b>31,586</b>	<b>10.2%</b>	<b>10.0%</b>	<b>2.43%</b>	<b>30,850</b>	<b>10.0%</b>	<b>10.0%</b>	<b>-1.31%</b>	<b>1.09%</b>	<b>29.16%</b>	<b>1.02%</b>	<b>N/A</b>
<i>MSCI EAFE - 50% Hedged</i>				2.12%				-0.72%	1.39%	26.98%	-1.27%	N/A
<b>DOMESTIC FIXED INCOME</b>												
<i>Core Bond</i>												
<b>Western Asset</b>	<b>49,071</b>	<b>15.8%</b>	<b>15.0%</b>	<b>0.90%</b>	<b>48,621</b>	<b>15.8%</b>	<b>15.0%</b>	<b>3.52%</b>	<b>4.46%</b>	<b>2.42%</b>	<b>7.77%</b>	<b>N/A</b>
<i>Lehman Aggregate</i>				0.84%				3.20%	4.06%	0.32%	6.35%	N/A
<i>Index</i>												
<b>Bank of ND</b>	<b>61,582</b>	<b>19.8%</b>	<b>22.5%</b>	<b>0.64%</b>	<b>61,187</b>	<b>19.9%</b>	<b>22.5%</b>	<b>2.54%</b>	<b>3.19%</b>	<b>0.07%</b>	<b>7.10%</b>	<b>N/A</b>
<i>Lehman Intermediate Gov/Credit (1)</i>				0.67%				2.71%	3.40%	-0.05%	6.97%	N/A
<i>BBB Average Quality</i>												
<b>Strong</b>	<b>27,572</b>	<b>8.9%</b>	<b>7.5%</b>	<b>1.12%</b>	<b>27,259</b>	<b>8.9%</b>	<b>7.5%</b>	<b>4.51%</b>	<b>5.68%</b>	<b>1.18%</b>	<b>N/A</b>	<b>N/A</b>
<i>Lehman US Credit BAA</i>				1.03%				4.76%	5.84%	1.96%	N/A	N/A
<b>TOTAL DOMESTIC FIXED INCOME</b>	<b>138,225</b>	<b>44.4%</b>	<b>45.0%</b>	<b>0.83%</b>	<b>137,067</b>	<b>44.6%</b>	<b>45.0%</b>	<b>3.27%</b>	<b>4.12%</b>	<b>0.79%</b>	<b>7.00%</b>	<b>N/A</b>
<i>Lehman Gov/Credit</i>				0.87%				3.56%	4.45%	-0.72%	6.73%	N/A
<b>CASH EQUIVALENTS</b>												
<b>Bank of ND</b>	<b>15,282</b>	<b>4.9%</b>	<b>5.0%</b>	<b>0.17%</b>	<b>15,247</b>	<b>5.0%</b>	<b>5.0%</b>	<b>0.44%</b>	<b>0.61%</b>	<b>1.20%</b>	<b>1.72%</b>	<b>N/A</b>
<i>90 Day T-Bill</i>				0.12%				0.37%	0.49%	0.98%	1.71%	N/A
<b>TOTAL NDACo FUND</b>	<b>311,126</b>	<b>100.0%</b>	<b>100.0%</b>	<b>1.13%</b>	<b>307,626</b>	<b>100.0%</b>	<b>100.0%</b>	<b>0.20%</b>	<b>1.33%</b>	<b>12.43%</b>	<b>4.55%</b>	<b>4.70%</b>
<i>POLICY TARGET BENCHMARK</i>				1.15%				0.80%	1.96%	10.55%	4.44%	4.41%

**NOTE: Monthly returns and market values are preliminary and subject to change.**

(1) Prior to April 1, 2004, the benchmark was the LB Govt/Credit index.